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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ABDIQAFAR WAGAFE, *et al.*, on behalf  
of themselves and others similarly situated,

Plaintiffs,

v.

DONALD TRUMP, President of the  
United States, *et al.*,

Defendants.

No. 2:17-cv-00094-RAJ

**DECLARATION HUGH HANDEYSIDE  
IN SUPPORT OF PLAINTIFFS'  
MOTION FOR SANCTIONS**

I, Hugh Handeyside, declare as follows:

1. I am an attorney admitted to practice in New York and Washington, and I am  
counsel for Plaintiffs in this case. I have personal knowledge of the facts set forth herein and am  
competent to testify thereto.

2. I am a 2007 graduate of the University of Michigan Law School and currently a  
Senior Staff Attorney at the American Civil Liberties Union Foundation, where I engage in  
litigation and advocacy on a range of matters related to national security. Prior to joining the  
ACLU, I worked as a litigation associate at Perkins Coie LLP and Corr Cronin Michelson  
Baumgardner & Preece LLP in Seattle. I also served as a law clerk to Judge John C. Coughenour  
of the U.S. District Court for the Western District of Washington.

3. I have recorded my time contemporaneously for this matter using the Toggl timekeeping platform. Attached as Exhibit A to this declaration is a true and correct copy of my time records for the work performed on the issues for which Plaintiffs' counsel are seeking attorneys' fees associated with Plaintiffs' motion for sanctions.

4. As supported by the Declaration of Carol Sobel, my hourly rate for the work performed is \$676.85 for 2018 and \$646.64 for 2017, based on my year of graduation and the market rates for Seattle, Washington.

5. Below is a chart that details the attorneys' fees that I am seeking with Plaintiffs' motion for sanctions, broken up by category. The total value of my work is \$3,779.60.

Cost Category	Time and Rate
Plaintiffs' Motion to Compel (Sept/Oct 2017)	1.6 Hours x \$646.64 Rate
	<b>\$1,034.62</b>
Defendants' Motion to Reconsider (Nov 2017)	0.3 Hours x \$646.64 Rate
	<b>\$193.99</b>
Executive Order Discovery (Nov 2017 – Jan 2018)	0.7 Hours x \$646.64 Rate
	<b>\$452.75</b>
Production Timeline (Dec 2017 – Jan 2018)	1.2 Hours x \$676.85 Rate
	<b>\$812.22</b>
Court Conferences & Follow-up (Feb – Mar 2018)	1.9 Hours x \$676.85 Rate
	<b>\$1286.02</b>
<b>TOTAL</b>	<b>\$3,779.60</b>

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 28th day of March, 2018, at New York, NY.

/s/ Hugh Handeyside  
Hugh Handeyside

## **CERTIFICATE OF SERVICE**

The undersigned certifies that on the date indicated below, I caused service of the foregoing DECLARATION OF HUGH HANDEYSIDE IN SUPPORT OF PLAINTIFFS' MOTION FOR SANCTIONS via the CM/ECF system that will automatically send notice of such filing to all counsel of record herein.

DATED this 29th day of March, 2018, at Seattle, Washington.

By: Laura K. Hennessey  
Laura K. Hennessey, #47447  
Attorneys for Plaintiffs  
**Perkins Coie LLP**  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
Telephone: 206.359.8000  
Facsimile: 206.359.9000  
Email: LHennessey@perkinscoie.com

**CERTIFICATE OF SERVICE  
(No. 17-cv-00094 RAJ) – 1**

**Perkins Coie LLP**  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
Phone: 206.35.8000  
Fax: 206.359.9000

# EXHIBIT A



# Detailed report

2017-09-01 - 2018-03-28

Total 05 h 53 min

CARRP selected as projects

MFS selected as tags

Date	Description	Duration	User
09-27	<b>Review and revise draft motion to compel</b>	<b>0:39:16</b>	Hugh Handeyside
	CARRP - [MFS]	10:46-11:25	
10-10	<b>Review response to motion to compel</b>	<b>0:39:02</b>	Hugh Handeyside
	CARRP - [MFS]	23:06-23:45	
10-19	<b>Review order on motion to compel; exchange correspondence on same</b>	<b>0:20:06</b>	Hugh Handeyside
	CARRP - [MFS]	13:54-14:14	
11-14	<b>Review response to motion for reconsideration</b>	<b>0:23:37</b>	Hugh Handeyside
	CARRP - [MFS]	14:40-15:03	
11-29	<b>Confer regarding court order and discovery issues</b>	<b>0:45:10</b>	Hugh Handeyside
	CARRP - [MFS]	14:31-15:16	
01-24	<b>Conference call re meet &amp; confer, motions to compel, and case schedule</b>	<b>0:39:28</b>	Hugh Handeyside
	CARRP - [MFS]	14:45-15:25	
01-25	<b>Review research on privilege invocations; confer re same</b>	<b>0:28:10</b>	Hugh Handeyside
	CARRP - [MFS]	16:56-17:25	
02-05	<b>Review draft submission to court regarding discovery disputes</b>	<b>0:42:26</b>	Hugh Handeyside
	CARRP - [MFS]	11:32-12:14	
02-07	<b>Confer regarding case issues and discovery motions</b>	<b>0:37:52</b>	Hugh Handeyside
	CARRP - [MFS]	14:30-15:08	
02-26	<b>Review draft status report</b>	<b>0:17:20</b>	Hugh Handeyside
	CARRP - [MFS]	12:00-12:17	
03-12	<b>Review status report and draft response, exchange correspondence on same</b>	<b>0:20:54</b>	Hugh Handeyside
	CARRP - [MFS]	10:33-10:54	

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